

**REMARKS**

Claims 1-2 and 5 are pending in this application. By this Amendment, claim 1 is amended and claims 3-4 are canceled.

**I. The Claims Define Patentable Subject Matter**

The Office Action rejects claims 1-5 under 35 U.S. §103(a) as unpatentable over U.S. Patent No. 5,982,381 to Joshi et al. in view of U.S. Patent No. 5,222,159 to Kawamura et al. This rejection is respectfully traversed.

The applied art does not teach, disclose or even suggest that the selection mask conversion module obtains the image selection mask by setting the base selection mask as one block data and repeating the block data in a two-dimensional manner, as claimed in claim 1.

The Examiner asserts that Joshi et al. discloses the feature of the selection mask conversion module that obtains the image selection mask by setting the base selection mask as one block data and repeating the block in a two-dimensional manner (Figure 4, elements 82 and 90 suggest scaling and a reiterative process to further change the sizing), on page 6 of the Office Action. The Examiner further asserts that it would have been obvious to one of skill in the art at the time of the invention to utilize the mask processing circuit 206 of Kawamura et al. to modify the method and apparatus for modifying a cutout image for compositing including reiterative mask generation means and scaling means of Joshi et al., because both inventions have at least similar technological areas related to obscured image recognition.

Applicant respectfully disagree with the Examiner's assertion. That is, Joshi et al. discloses the following at column 6, line 49-column 7, line 6, and Figure 4: A selected clamping function is applied to the distance mask to determine the scaling values of the respective pixels in the input sprite (step 82); pixels of a modified sprite are constructed from

the corresponding pixels of the input sprite according to their respective scaling values (step 84); the modified sprite is then composited with the background image to form a composite image (step 86); and if the user decides that the selected clamping function did not result in a desirable visual effect in the composite image, an input may be entered to select a different clamping function (step 90), and the same steps are reiterated.

Accordingly, Joshi et al. only discloses reiterating a clamping function selection process until a desirable visual effect is obtained in the composite image. As such, a reiterative process or a reiterate mask generation means as disclosed by Joshi et al. is different from "repeating block data in a two-dimensional manner" as disclosed in the present invention. Accordingly, Joshi et al. provides no disclosure or suggestion of repeating block data in a two-dimensional manner.

Kawamura et al. does not make up for the deficiency of Joshi et al. discussed above. The Examiner asserts that because Kawamura's mask boundary data is stored into the mask memory, the image converting processes such as enlargement, reduction, rotation, etc., can be performed by use of the mask memory of a small capacity without limiting the mask shape (abstract, lines 10-14), provides a more detailed database structure/storage capacity to manipulate display attributes. However, with regard to the image converting processes, Kawamura et al. merely exemplifies processes such as enlargement, reduction, rotation, etc., and Kawamura et al. provides no disclosure of "repeating block data in a two-dimensional manner."

Accordingly, the above recited features are not disclosed in the applied art. As such, the claimed invention is patentable over Joshi et al. in view of Kawamura et al. Withdrawal of the rejection under 35 U.S.C. §103(a) is respectfully requested.

**II. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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